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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION**

NORTHERN PLAINS RESOURCE
COUNCIL, et al.,

Plaintiffs,

v.

U.S. ARMY CORPS OF ENGINEERS,
et al.,

Defendants,

TC ENERGY CORPORATION, et al.,

Intervenor-Defendants,

STATE OF MONTANA,

Intervenor-Defendant,

AMERICAN GAS ASSOCIATION,
et al.,

Intervenor-Defendants.

CV 19-44-GF-BMM

**Declaration of Charlotte Adams in
Support of Plaintiffs' Opposition to
Defendants' Motions for Stay
Pending Appeal**

I, Charlotte Adams, declare as follows:

1. I live in Wimberley, Texas. I bought the property, undeveloped at the time, 24 years ago. I carefully cleared the land of non-native trees and built my house and horse facility myself. It's my own slice of heaven.

2. I make my living as a guitar instructor, but also hold retreats and workshops on my property. I have also occasionally taught horseback riding. My land is two miles from the nearest paved road, and I have put a lot of work into making this country setting a beautiful and relaxing place to be.

3. All that work could be undone if Kinder Morgan's proposed Permian Highway pipeline gets built. The pipeline would cross within half a mile of my backyard, putting me within the blast zone.

4. I am deeply concerned about the effects this project could have on myself and the local community and environment. One of my biggest concerns is that the pipeline will endanger the area's waterways. Here in Hill Country, water is everything. One of the area's most iconic water features, Blue Hole, is right here in Wimberley. These waterways are gorgeous and are what drew me to the area. I enjoy visiting them to swim and view the surrounding wildlife and scenery. They also support a big tourist industry. That business will evaporate if these beautiful places get destroyed—which is what might happen if the pipeline is completed.

5. The pipeline could also contaminate the drinking water supply for me and millions of other people. In fact, there was already a leak last month associated with construction activities. From what I understand, Kinder Morgan had begun drilling underneath the Blanco River and spilled thousands of gallons of drilling fluids. The company originally claimed that the drilling fluids were non-toxic bentonite clay, but water tests later showed that the fluids contained carcinogenic chemicals. That spill caused the water in some nearby wells to turn brown. This makes me very worried about my own well. This area is over a karst aquifer, which means that any contamination could easily and quickly spread.

6. The pipeline's other environmental impacts are also concerning. These past two months, the company has started clear-cutting live oaks in the area to make room for the pipeline. I understand that these oaks provide important habitat for the endangered golden cheeked warbler. Thinking about the harmful effects the pipeline could have on these birds, on local waterways, and on Wimberley's inherent beauty is just devastating.

7. I've spent more than a year fighting against the Permian Highway pipeline. I'm an active supporter of the Wimberley Valley Watershed Association, which works to protect our community's beloved rivers, creeks, and aquifers and educate the public about the pipeline's threats. I also follow the Blanco Stop the

Pipeline Facebook page, which provides a lot of helpful information about the project and its impacts.

8. I also support several other environmental organizations and am a member of the Natural Resources Defense Council and Friends of the Earth. These groups really go to bat for the environment and help make sure that we can all enjoy a clean, healthy planet.

9. I am aware of Natural Resources Defense Council's and Friends of the Earth's litigation involving Nationwide Permit 12 and was glad to hear that the district court invalidated the use of the permit for all utility projects. The federal government should not be allowing massive pipelines like Permian Highway to be built without a careful analysis of these projects' impacts to local waterways and species. Construction of the Permian Highway pipeline has only just begun, and it has already experienced a leak. For these reasons, I strongly support the continued invalidation of Nationwide Permit 12 for the construction of new oil and gas pipelines like the Permian Highway Pipeline until the federal government revises its environmental analysis of the permit consistent with applicable law.

I declare under penalty of perjury under the laws of the United States of America
that the foregoing is true and correct.

Signed on May 6, 2020, in Wimberley, TX.


Charlotte Adams